



September 27, 2023

VIA E-FILING

The Honorable Colm F. Connolly
J. Caleb Boggs Federal Building
844 N. King Street
Unit 31, Room 4124
Wilmington, DE 19801-3555

Re: ***Koninklijke Philips N.V., et al. v. Dell Technologies Inc., et al.***
C.A. No. 20-cv-1240-43, 46-47-CFC

Dear Chief Judge Connolly,

Pursuant to the Oral Order issued on September 21, 2023, the parties respectfully report the status of the following pending motions:

C.A. No. 20-cv-1240:

- D.I. 14 Defendant Dell's Motion to Dismiss (8/9/22) is moot in light of D.I. 21 Philips' First Amended Complaint (8/30/22).

C.A. No. 20-cv-1241:

- D.I. 21 Defendant HP's Motion to Dismiss Indirect Infringement Claims (8/24/22) is moot in light of D.I. 32 Philips' First Amended Complaint (9/14/22).
- D.I. 63 Defendant HP's Motion for Summary Judgment of Indefiniteness (8/10/23) is not moot and needs to be decided.

C.A. No. 20-cv-1242:

- D.I. 21 Defendant Lenovo's Motion to Dismiss Indirect Infringement Claims (8/17/22) is moot in light of D.I. 29 Philips' First Amended Complaint (9/7/22).
- D.I. 31 Defendant Lenovo's Motion to Dismiss Indirect Infringement Claims (9/21/22) is not moot and needs to be decided.

C.A. No. 20-cv-1243:

- D.I. 14 Defendant Intel's Motion to Dismiss Indirect Infringement Claims (7/22/22) is moot in light of D.I. 21 Philips' First Amended Complaint (8/12/22).
- D.I. 22 Defendant Intel's Renewed Motion to Dismiss Indirect Infringement Claims (8/26/22) is not moot and needs to be decided.

C.A. No. 20-cv-1246:

- D.I. 13 Defendant MediaTek's Motion to Dismiss Indirect Infringement Claims (8/29/22) is moot in light of D.I. 23 Philips' First Amended Complaint (9/19/22).
- D.I. 30 Defendant MediaTek's Motion to Dismiss Indirect Infringement Claims (10/3/22) is not moot and needs to be decided.
- D.I. 61 Joint Letter Regarding MediaTek's Request for Leave to File a Motion for Summary Judgment of Invalidity Due to Lack of Written Description (8/4/23) is not moot and needs to be decided.

C.A. No. 20-cv-1247:

- D.I. 27 Defendant Realtek's Motion to Dismiss the Complaint for Lack of Personal Jurisdiction (9/28/22) is moot in light of D.I. 36 Philips' First Amended Complaint (10/19/22).
- D.I. 38 Defendant Realtek's Motion to Dismiss the First Amended Complaint for Lack of Personal Jurisdiction (11/2/22) is not moot and needs to be decided.
- D.I. 58 Joint Letter Regarding Dispute Concerning Transfer of ITC Record (02/22/22) is not moot and needs to be decided.
- D.I. 33 Joint Letter Regarding Dispute over Scheduling Order (10/05/22) is moot because no Scheduling Order was entered in this action. If D.I. 38 Realtek's Motion to Dismiss is denied, the parties will meet and confer to discuss a Scheduling Order for the remainder of this action.

Respectfully submitted,

/s/ Brian E. Farnan

Brian E. Farnan

cc: Counsel of Record (Via E-Filing)